

REMARKS

Claims 1-13, 41-50, 82-92, 98-101, and 103 remain in the application for consideration. In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application.

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Interview Summary

Applicant's attorney, Chris Culberson, wishes to thank Examiner Rachna Desai for discussing this application over the phone on September 2, 2008.

During this discussion, Applicant's attorney and Examiner Desai discussed
10 two issues from the Office Action of July 28, 2008. First, the § 112, second paragraph, rejections of claims 1-13, 41-50, 82-92, 98-101, and 103 were discussed. During this discussion, Applicant's attorney pointed out sections of Applicant's specification that discussed the subject matter that was the focus of the § 112 rejections. In view of this discussion, the Examiner agreed that the § 112
15 rejections were no longer necessary.

Second, the § 103(a) rejections of the independent claims were discussed. While no agreement was reached with respect to these rejections, Applicant's attorney has considered the Examiner's comments in crafting this response.

In light of these discussions, Applicant respectfully requests that the
20 Examiner contact Applicant's attorney to discuss this application before issuing any subsequent rejections.

§ 112 Rejections

During the Examiner Interview, the § 112, second paragraph, rejections of
25 claims 1-13, 41-50, 82-92, 98-101, and 103 were discussed. The Examiner agreed that, in light of this discussion, the § 112 rejections were no longer necessary. Accordingly, Applicant respectfully requests that the § 112, second paragraph, rejections of these claims be withdrawn.

Rejections under § 103

Claims 1-13, 41-43, 50, 82-92, 98, 101, and 103 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Laura Acklen & Read Gilgen, Using Corel WordPerfect 9, 251-284, 424-434, 583-586 (1998) (hereinafter “Acklen”), in view of Webopedia Computer Dictionary (hereinafter “Webopedia”), pages 1-7 (and newly added supplemental page 1 (available at www.pcwebopedia.com)).

Claims 44-49 and 99-101 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Acklen in view of Webopedia and further in view of U.S. Patent No. 5,630,126 to Redpath (“Redpath”).

The Claims

Independent claim 1 includes the feature of:

- a spreadsheet functionality manager to manage spreadsheet functions for the table, the functions comprising: determining whether the cell is word-processing based or spreadsheet-based.

In its rejection of claim 1 over the combination of Acklen and Webopedia, the Office cites to page 431 of Acklen and argues that that “Wordperfect interprets cells with text in it (sic) as word-processing based, and thus ignores these cells in processing spreadsheet-based cells....” Final Office Action at page 4. Though not explicitly stated, the Office appears to be arguing that Acklen discusses the ability to determine whether a cell is word-processing based or spreadsheet based. Applicant respectfully disagrees.

To aid in this discussion, Applicant hereafter excerpts the section of Acklen cited by the Office in support of its argument above:

Ignoring Values in Text Cells

I created an invoice using a table, but when I calculate the total due, it's always wrong. I checked the formulas and they're all correct.

Check to see if your formula includes a text cell, and whether that text cell contains any numbers. WordPerfect ignores text and uses the numeric value of a cell that contains both text and numbers. For example, if you're adding an entire column, and the top cell contain[s] an invoice number, the value of the invoice number is added to the total of the column.

To avoid this problem, right-click the cell, choose Format, and in the Cell tab of the Table Format dialog box, choose Ignore Cell When Calculating. Then recalculate the table, and the formula should now yield the correct result.

Applicant submits that this section of Acklen makes no mention of the above-mentioned feature of claim 1. This section of Acklen simply discusses that WordPerfect, when it encounters a formula that includes a text cell, ignores text in the cell and uses a numeric value of a cell that contains both text and numbers. In utilizing this functionality, WordPerfect is simply capturing numbers from a cell that contains “both text and numbers”. It is not making a determination as to the nature of the cell, i.e., whether a cell is word-processing based or spreadsheet-based, as recited in claim 1.

As also indicated in the section of Acklen excerpted above, the user has created a formula that “includes a text cell”. By including the cell in a formula in the first place, the user is instructing Wordperfect to use the data within the cell to calculate the formula. Thus, the user is making the determination of the nature of the cell (i.e., to include the cell in a formula), not a spreadsheet functionality manager.

The Office further argues in the “Response to Arguments” section of the office action that:

5 Specifically, if a cell is interpreted as a word-processing based cell, Wordperfect does not treat it as a “spreadsheet based cell” and prevents any calculations. Final Office Action at page 15.

10 However, as discussed above, Acklen does not determine if a cell is word-processing based or spreadsheet based. Further, Acklen discusses that a user expressly designates that a cell should be ignored when a formula is calculated, not a spreadsheet functionality manager.

15 In contrast, Applicant’s claim 1 recites that a spreadsheet functionality manager that is part of the claimed architecture determines whether the cell is word-processing based or spreadsheet-based. This further distinguishes the subject matter of claim 1 from the cited references. Even if Acklen did disclose or suggest the ability to determine whether a cell is word-processing based or spreadsheet-based (which it does not), it would rely on a user’s express designation of the cell type and not a determination by a spreadsheet functionality manager (e.g., in Acklen, the user would “right-click the cell, choose Format, and
20 in the Cell tab of the Table Format dialog box, choose Ignore Cell When Calculating”).

Independent claim 1 also includes the feature of:

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- treating an enter key typed into the cell as meaning a return command in the event that the cell is interpreted as word-processing based or as meaning a command to navigate to another cell in the event that the cell is interpreted as spreadsheet-based.

In rejecting claim 1 over Acklen and Webopedia, the Office argues that:

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However, Webopedia discloses that the Enter key has a duality of functions: (i) return key, or (ii) moves cursor to the next field (see pg. 1). Furthermore, it was commonly known to those of ordinary

5 skill in the art and would have been obvious at the time the invention was made to a person having ordinary skill in the art that the Enter key served the function of a "return" key in electronic word processing documents and served the function of moving a cursor to the next field in electronic spreadsheet documents.

10 This argument, however, fails to address the above-mentioned feature of claim 1. The above-mentioned feature pertains to an enter key typed **into a cell in a table** and is linked to a determination whether the cell is word-processing based or spreadsheet-based. Since the cited references fail to disclose or suggest the ability to determine if a cell is word-processing based or spreadsheet-based, they cannot disclose the feature of "treating an enter key typed into the cell as meaning a return command in **the event that the cell is interpreted as word-processing based** or as meaning a command to navigate to another cell **in the event that the**
15 **cell is interpreted as spreadsheet-based**". This feature is simply missing from the cited references.

Accordingly, and at least for the above-mentioned reasons, the Office has failed to establish a prima facie case of obviousness with respect to claim 1 and claim 1 is allowable.

20 **Claims 2-13** depend from claim 1 and thus are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 1, are neither disclosed nor suggested by the references of record.

25 **Independent claims 41, 82, 85, 87, 89, 92, and 98** each recite one or more variations of the feature of determining whether a cell is word-processing based or spreadsheet-based. Each of these claims has been rejected allegedly for being obvious over Acklen in view of Webopedia. However, as discussed above, this combination of references fails to disclose or suggest the feature of determining whether a cell is word-processing based or spreadsheet-based. Accordingly, and
30 at least for this reason, Applicant submits that the Office has failed to establish a

prima facie case of obviousness with respect to independent claims 41, 82, 85, 87, 89, 92, and 98, and these claims are allowable.

5 **Dependent claims 42-50, 83, 84, 86, 88, 90, 91, 99-101, and 103** each depend from one of the independent claims discussed above and thus are allowable as depending from an allowable base claim. Each of these claims is also allowable for its own recited features which, in combination with those recited in the independent claim from which it depends, are neither disclosed nor suggested by the references of record.

10 The Office has further rejected dependent claims 44-49 for allegedly being obvious over Acklen in view of Webopedia and further in view of Redpath. However, as discussed above, the combination of Acklen and Webopedia fails to disclose or suggest all of the features of independent claim 41, from which claims 44-49 depend. The addition of Redpath fails to remedy this deficiency. Accordingly, and at least for this reason, Applicant submits that the Office has
15 failed to establish a prima facie case of obviousness with respect to dependent claims 44-49 and these claims are allowable.

20 The Office has further rejected dependent claims 99 and 100 for allegedly being obvious over Acklen in view of Webopedia and further in view of Redpath. However, as discussed above, the combination of Acklen and Webopedia fails to disclose or suggest all of the features of independent claim 98, from which claims 99 and 100 depend. The addition of Redpath fails to remedy this deficiency. Accordingly, and at least for this reason, Applicant submits that the Office has failed to establish a prima facie case of obviousness with respect to dependent claims 99 and 100 and these claims are allowable.

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Conclusion

All of the claims are in condition for allowance. Accordingly, Applicant requests that the Office issue a Notice of Allowability. If the Office's next anticipated action is to be anything other than issuance of a Notice of Allowability,

Applicant respectfully requests a telephone call for the purpose of scheduling an interview.

Respectfully Submitted,

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